

3. This Notice of Removal is timely filed under 28 U.S.C. § 1446 (b) having been filed within 30 days of service of the Summons and Complaint.

4. No other process, pleadings, or orders have been served on Defendants, and Defendants have not filed an Answer or otherwise responded to the Complaint.

5. This Court has original jurisdiction of the Complaint in the above-styled action in accordance with 28 U.S.C. § 1331 because it is a civil action alleging violation of 18 U.S.C. § 1962 the Racketeer Influenced and Corrupt Organizations Act. This Court has supplemental jurisdiction over the state law claims in accordance with 28 U.S.C. § 1367 because the state law claims are so related to the RICO claims over which this Court has original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.

6. Removal of this action to this Court is proper under 28 U.S.C. § 1441 because this Court has original jurisdiction of this action under 28 U.S.C. § 1331.

7. Venue is proper in this district under 28 U.S.C. § 1446 (a) as the United States District Court for the Western District of Tennessee, Jackson Division, is the federal district court for the district and division within which the above-referenced state-court action is pending.

8. In accordance with 28 U.S.C. § 1446 (d), Defendants promptly will file a copy of the Notice of Removal with the Circuit Court Clerk of Madison County, Tennessee and give written notice of this Notice of Removal to Plaintiffs.

Defendants request this action be removed from the Circuit Court of Madison County, Tennessee to the United States District Court for the Western District of Tennessee.

Dated this 10th day of September, 2013.

Respectfully submitted,

BASS, BERRY & SIMS

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by United States certified mail, postage prepaid, to

Ethel and Isaac H. Brooks

124 Jacob Street

Jackson, TN 38305

Natasha Bond

C/O Isaac H. Brooks

124 Jacob Street

Jackson, TN 38305

on this 10th day of September, 2013.

s/ Stephanie A. Roth

Stephanie A. Roth